

Exhibit A

IN THE SUPERIOR COURT OF MONROE COUNTY

STATE OF GEORGIA

ARTHUR WIGGINS,

Plaintiff,

VS.

CRST EXPEDITED, INC.;

CRST MALONE, INC. D/B/A

CRST DEDICATED SERVICES INC.;

ALBERT WAYNE CALHOUN and John Doe,

Defendants.

CIVIL ACTION FILE NO.

PLAINTIFF'S COMPLAINT FOR DAMAGES

COMES NOW ARTHUR WIGGINS, Plaintiff in the above-styled action, by and through his undersigned counsel of record, and files this his Complaint for Damages against Defendants CRST EXPEDITED, INC.; CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC.; ALBERT WAYNE CALHOUN and John Doe (hereinafter sometimes collectively referred to as “Defendants”), and respectfully shows this honorable Court as follows:

JURISDICTION AND VENUE

1.

This action is for injuries and damages sustained by Plaintiff as a result of a tractor trailer-motor vehicle collision on August 15, 2020, caused by Defendants.

2.

By the filing of the instant action, Plaintiff subjects himself to the jurisdiction and venue of this Court.

3.

Defendant Albert Wayne Calhoun (hereinafter “Calhoun”) resides at 1412 S. SYCAMORE

STREET, PALESTINE, TEXAS 75801. Service of the Summons and a copy of this Complaint may be made upon Defendant Calhoun at this address and via Georgia Non-Resident Motorist Act.

4.

Defendant Calhoun is subject to the jurisdiction and venue of this Court.

5.

Defendant CRST EXPEDITED, INC. (hereinafter “CRST EXPEDITED”) is a Foreign Profit Corporation, organized under the laws of the State of Iowa, having its principal place of business located at 3930 16th Ave. SW, Cedar Rapids, Iowa, and may be served with process through its registered agent, Cogency Global Inc., 900 Old Roswell Lakes Pkwy, Suite 310, Roswell, Fulton County, Georgia 30076.

6.

Defendant CRST MALONE, INC., d/b/a CRST DEDICATED SERVICES INC. is a Foreign Profit Corporation, organized under the laws of the State of Alabama, having its principal place of business located at 601 Vestavia Pkwy, #200, Vestavia Hills, AL, and may be served with process through its registered agent COGENCY GLOBAL INC., 2 NORTH JACKSON STREET, SUITE 605, MONTGOMERY, AL 36104.

7.

Defendant JOHN DOE is a fictitious entity, corporation or individual who may hold some responsibility for the incident but is unknown at this time.

8.

The 2020 Freightliner Tractor Trailer truck that Defendant Calhoun was driving at the time of the collision forming the basis of Plaintiff’s Complaint was registered as being owned by CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC.

9.

Plaintiff and Defendants are subject to the jurisdiction and venue of this Court.

10.

This Court has subject matter jurisdiction over the matters at issue in this civil action; to wit: (a) Negligence; (b) Negligence *Per Se*; (c) Negligent Entrustment; (d) *Respondeat Superior*; and (e) Attorney's Fees, caused by Defendants' tortious activity.

FACTS

11.

At all times mentioned herein, The Defendant CRST MALONE, INC., d/b/a CRST DEDICATED SERVICES owned, operated, controlled and/or managed a transportation company and including numerous commercial motor vehicle Tractor-Trailer trucks.

12.

At all times mentioned herein, Defendant Calhoun was an employee of the Defendants CRST EXPEDITED, INC and or CRST MALONE, INC., d/b/a CRST DEDICATED SERVICES INC. and operated one of the Defendants CRST EXPEDITED, INC and or CRST MALONE, INC., d/b/a CRST DEDICATED SERVICES INC. commercial motor vehicles identified by USDOT Number 98137.

13.

On or about August 15, 2020, while driving on State Route 41 South in the vicinity of the Rumble Road exit, Monroe County, Georgia, a tractor-trailer truck driven by Defendant Calhoun and owned by the Defendant CRST MALONE., INC d/b/a CRST DEDICATED SERVICES INC. ran headlong into the rear of the car being driven by Plaintiff. (the "Subject Collision").

14.

At the time of the collision forming the basis of Plaintiff's Complaint, Defendant Calhoun, an employee and agent of the Defendants CRST EXPEDITED, INC and or CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC., while in the course and scope of his employment with the Defendants CRST EXPEDITED, INC and or CRST MALONE, INC., D/B/A CRST DEDICATED SERVICES INC., was traveling on State Route 401 South in the vicinity of the Rumble Road exit, Monroe County, Georgia negligently driving and operating a white 2020 Freightliner, VIN Number: unknown ("tractor trailer").

15.

At all times material hereto, Plaintiff was operating his vehicle in a safe, reasonable, and prudent fashion.

16.

The Subject Collision was not the result of negligence on the part of Plaintiff.

17.

The Subject Collision was solely and proximately caused by the negligence of Defendant Calhoun and the Defendants CRST EXPEDITED, INC and or CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC.

18.

As a result of the Subject Collision, Plaintiff sustained property damage, bodily injuries, medical expenses, economic damages, as well as past, present and future physical and emotional pain and suffering.

COUNT I
NEGLIGENCE
(As to Defendant Calhoun)

19.

The allegations set forth in the preceding paragraphs are hereby incorporated by reference as if fully set forth and re-alleged herein.

20.

Defendant Calhoun owed a duty to Plaintiff and the general public to exercise ordinary care in the operation of his commercial motor vehicle.

21.

Defendant Calhoun breached his duty to exercise ordinary care in the operation of his commercial motor vehicle when he was following too closely and caused a collision resulting in Plaintiff's injuries and damages.

22.

As a result of their above-described actions, Defendant Calhoun was negligent in the operation of his vehicle, said negligence being the sole and proximate cause of the Subject Collision.

23.

As a direct and proximate result of the Subject Collision caused by the negligence of Defendant Calhoun, Plaintiff sustained property damage, bodily injuries, medical expenses, economic damages, as well as past, present and future physical and emotional pain and suffering.

24.

Defendant Calhoun therefore liable to Plaintiff for special and general damages in amounts to be proven by the evidence at trial.

COUNT II
NEGLIGENCE *PER SE* – VIOLATION OF O.C.G.A. § 40-6-49
(As to Defendant Calhoun)

25.

The allegations set forth in the preceding paragraphs are hereby incorporated by reference as if fully set forth and re-alleged herein.

26.

O.C.G.A. § 40-6-49 states in part that “A vehicle shall not follow another vehicle more closely than is reasonable and prudent, having due regard for the speed of such vehicles and the traffic upon and the condition of the highway.”

27.

Defendant Calhoun violated O.C.G.A. § 40-6-49 when he unlawfully failed to follow Plaintiff’s vehicle more closely than was reasonable and prudent and caused a collision ultimately resulting in Plaintiff’s injuries and damages.

28.

Defendant Calhoun’s violation of O.C.G.A. § 40-6-49 constitutes negligence *per se*, as the statute referenced above was intended to prevent the aforementioned conduct of Defendant Calhoun and to protect other drivers, passengers, and property owners from injury and damages such as the ones sustained by Plaintiff.

29.

Defendant Calhoun’s violation of O.C.G.A. § 40-6-49 was the sole and proximate cause of Plaintiff’s injuries and damages.

30.

As a result of Defendant Calhoun’s violation of O.C.G.A. § 40-6-49, Plaintiff sustained

property damage, bodily injuries, medical expenses, economic damages, as well as past, present and future physical and emotional pain and suffering.

31.

Defendant Calhoun is therefore liable to Plaintiff for special and general damages in amounts to be proven by the evidence at trial.

COUNT III
NEGLIGENCE

(As to The CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC. Defendants)

32.

The allegations set forth in the preceding paragraphs are hereby incorporated by reference as if fully set forth and re-alleged herein.

33.

Defendant Calhoun owed duties of exercising due and reasonable care to Plaintiff, as well as to the other motorists and passengers on the roadway.

34.

Defendant Calhoun breached those duties owed to Plaintiff by operating his tractor-trailer in an unsafe, reckless, and negligent manner.

35.

Defendant Calhoun's negligence, which was the direct and proximate cause of the injuries sustained by Plaintiff, included but were not limited to the following:

- a. Failing to keep a proper lookout;
- b. Failing to observe or undertake necessary precautions to avoid causing a collision with Plaintiff's vehicle;

- c. Failing to take evasive or other reasonable actions in order to prevent or minimize the impact between the vehicles;
- d. Failing to maintain reasonable control of his commercial tractor trailer vehicle;
- e. Failing to operate his commercial vehicle in a safe fashion under the circumstances then existing;
- f. Failing to exercise ordinary care; and
- g. Committing other negligent acts and omissions as shall be shown by the evidence and proven at trial.

36.

At all times material hereto, and specifically at the time of the subject collision, Defendant Calhoun's negligent acts, omissions, and conduct were committed while in the course and scope of his employment and while in his capacity as an employee and agent of the Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC.

37.

At the time of the subject Collision, the Defendant CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC. had the right to control the actions and conduct of Defendant Calhoun, and Defendant Calhoun was acting under the direction and control of the Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC.

38.

The Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC., as employers of Defendant Calhoun, are vicariously liable to the Plaintiff for Defendant Calhoun's negligent acts, omissions, and conduct under the doctrines of agency and *respondeat superior*.

39.

The Defendants CRST EXPEDITED, INC., CRST MALONE, INC., d/b/a CRST DEDICATED SERVICES INC. negligently hired Defendant Calhoun.

40.

The Defendants CRST EXPEDITED, INC., CRST MALONE, INC., d/b/a CRST DEDICATED SERVICES INC. negligently trained Defendant Calhoun.

41.

The Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC. negligently retained Defendant Calhoun.

42.

The Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC. negligently supervised Defendant Calhoun.

43.

The Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC. negligently entrusted Defendant Calhoun with the subject commercial tractor-trailer.

44.

The Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC. negligent entrustment, hiring, training, supervision, and retention of Defendant Calhoun proximately caused Plaintiff to sustain property damage, bodily injuries, medical expenses, economic damages, as well as past, present and future physical and emotional pain and suffering.

45.

The Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC. are therefore liable to Plaintiff for special and general damages in amounts to be proven by the evidence at trial.

COUNT IV
NEGLIGENCE *PER SE*
(As to CRST EXPEDITED, INC and or CRST MALONE, INC., d/b/a CRST DEDICATED SERVICES INC. Defendants)

46.

The allegations set forth in the preceding paragraphs are hereby incorporated by reference as if fully set forth and re-alleged herein.

47.

At all relevant times, Defendant Calhoun and the Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC. were subject to the minimum standards established by the Federal Motor Carrier Safety Regulations, either directly or as adopted by Ga. Comp. R. and Regs. 515-16-4-.01.

48.

At all times material hereto, and specifically at the time of the subject collision, Defendant Calhoun's negligent acts, omissions, and conduct were committed during the course and scope of his employment and while in his capacity as an employee and agent of the Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC. Defendants.

49.

At the time of the subject collision, The Defendants CRST EXPEDITED, INC., CRST MALONE INC. d/b/a CRST DEDICATED SERVICES INC. had the right to control the actions

and conduct of Defendant Calhoun, and Defendant Calhoun was acting under the direction and control of the Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC.

50.

The Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC., as employer of Defendant Calhoun, are liable to the Plaintiff for Defendant Calhoun's negligent acts, omissions, and conduct under the doctrines of agency and *respondeat superior*.

51.

At all times pertinent hereto, Defendant Calhoun was acting within the course and scope of his employment in his role as a driver, agent, servant, and/or employee of CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC., Defendants.

52.

At the time of the subject collision, Defendant Calhoun and the Defendants CRST EXPEDITED, INC., CRST MALONE, INC. D/B/A CRST DEDICATED SERVICES INC. failed to meet the minimum standards established by the Federal Motor Carrier Safety Regulations, either directly or as adopted by Ga. Comp. R. and Regs. 515-16-4-.01.

53.

Defendant Calhoun and the Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC. violation of Federal Motor Carrier Safety Regulations was the sole and proximate cause of Plaintiff's injuries and damages.

54.

As a result of Defendant Calhoun and the Defendants CRST EXPEDITED, INC., CRST

MALONE, INC. d/b/a CRST DEDICATED SERVICES INC. violation of Federal Motor Carrier Safety Regulations, Plaintiff sustained property damage, bodily injuries, medical expenses, economic damages, as well as past, present and future physical and emotional pain and suffering.

55.

Defendant Calhoun and the Defendants CRST EXPEDITED, INC., CRST MALONE, INC. d/b/a CRST DEDICATED SERVICES INC. are therefore liable to Plaintiff for special and general damages in amounts to be proven by the evidence at trial.

WHEREFORE, Plaintiff prays for a judgment against Defendants as follows:

- (a) That there be a trial by jury;
- (b) For special damages in an amount to be proven by the evidence at trial;
- (c) For general damages, including damages for past, present and future pain and suffering, all special, compensatory, economic, incidental, consequential damages, and all other damages permissible under Georgia law;
- (d) For the cost and expenses of this action, including reasonable attorney's fees as allowed by law; and
- (e) For any and all further relief as this honorable Court deems just and proper under the circumstances.

Respectfully submitted this 3rd day of August, 2022.

KENNETH S. NUGENT, P.C.

/s/ Christopher J. Adams
Christopher J. Adams
Georgia State Bar No.: 002709
Jan P. Cohen
Georgia State Bar No.: 174337
Attorneys for Plaintiff

The Peachtree, Suite 1000
Atlanta, Georgia 30309
T: (404) 253-5839 | F: (404) 253-5761
cadams@attorneykennugent.com

4227 Pleasant Hill Road
Building 11, Suite 300
Duluth, Georgia 30096
T: (770) 495-6694 | F: (770) 495-6760
jcohen@attorneykennugent.com

This 3rd day of August, 2022.

Respectfully submitted,
KENNETH S. NUGENT, P.C.

/s/ Christopher J. Adams
Christopher J. Adams, Esq.
GA Bar No. 002709
Attorney for Plaintiff

**SUPERIOR COURT OF MONROE COUNTY
STATE OF GEORGIA**

CIVIL ACTION NUMBER 2022-SU-CV-0308

Wiggins, Arthur

PLAINTIFF

VS.

CRST Expedited, Inc.
CRST Malone, Inc. d/b/a CRST Dedicated
Services Inc.
Calhoun, Albert Wayne
Doe, John

DEFENDANTS

SUMMONS

TO: GEICO GENERAL INSURANCE COMPANY

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Christopher Adams
Kenneth S. Nugent, P.C.
1355 Peachtree Sreet NE
Suite 1000
Atlanta, Georgia 30309**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 3rd day of August, 2022.

Clerk of Superior Court

A handwritten signature in blue ink that reads "Lindsey Taylor". The signature is written in a cursive, flowing style.

Lindsey Taylor, Clerk
Monroe County, Georgia

**SUPERIOR COURT OF MONROE COUNTY
STATE OF GEORGIA**

CIVIL ACTION NUMBER 2022-SU-CV-0308

Wiggins, Arthur

PLAINTIFF

VS.

CRST Expedited, Inc.
CRST Malone, Inc. d/b/a CRST Dedicated
Services Inc.
Calhoun, Albert Wayne
Doe, John

DEFENDANTS

SUMMONS

TO: DOE, JOHN

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Christopher Adams
Kenneth S. Nugent, P.C.
1355 Peachtree Sreet NE
Suite 1000
Atlanta, Georgia 30309**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 3rd day of August, 2022.

Clerk of Superior Court



Lindsey Taylor, Clerk
Monroe County, Georgia

**SUPERIOR COURT OF MONROE COUNTY
STATE OF GEORGIA**

CIVIL ACTION NUMBER 2022-SU-CV-0308

Wiggins, Arthur

PLAINTIFF

VS.

CRST Expedited, Inc.
CRST Malone, Inc. d/b/a CRST Dedicated
Services Inc.
Calhoun, Albert Wayne
Doe, John

DEFENDANTS

SUMMONS

TO: CALHOUN, ALBERT WAYNE

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Christopher Adams
Kenneth S. Nugent, P.C.
1355 Peachtree Sreet NE
Suite 1000
Atlanta, Georgia 30309**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 3rd day of August, 2022.

Clerk of Superior Court

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Lindsey Taylor, Clerk
Monroe County, Georgia

**SUPERIOR COURT OF MONROE COUNTY
STATE OF GEORGIA**

CIVIL ACTION NUMBER 2022-SU-CV-0308

Wiggins, Arthur

PLAINTIFF

VS.

CRST Expedited, Inc.
CRST Malone, Inc. d/b/a CRST Dedicated
Services Inc.
Calhoun, Albert Wayne
Doe, John

DEFENDANTS

SUMMONS

TO: CRST MALONE, INC. D/B/A CRST DEDICATED SERVICES INC.

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Christopher Adams
Kenneth S. Nugent, P.C.
1355 Peachtree Sreet NE
Suite 1000
Atlanta, Georgia 30309**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 3rd day of August, 2022.

Clerk of Superior Court



Lindsey Taylor, Clerk
Monroe County, Georgia

**SUPERIOR COURT OF MONROE COUNTY
STATE OF GEORGIA**

CIVIL ACTION NUMBER 2022-SU-CV-0308

Wiggins, Arthur

PLAINTIFF

VS.

CRST Expedited, Inc.
CRST Malone, Inc. d/b/a CRST Dedicated
Services Inc.
Calhoun, Albert Wayne
Doe, John

DEFENDANTS

SUMMONS

TO: CRST EXPEDITED, INC.

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Christopher Adams
Kenneth S. Nugent, P.C.
1355 Peachtree Sreet NE
Suite 1000
Atlanta, Georgia 30309**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 3rd day of August, 2022.

Clerk of Superior Court

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Lindsey Taylor, Clerk
Monroe County, Georgia

General Civil and Domestic Relations Case Filing Information Form

CLERK OF SUPERIOR COURT
MONROE COUNTY, GEORGIA☒ Superior or ☐ State Court of MonroeCounty **2022-SU-CV-0308**

For Clerk Use Only

AUG 03, 2022 06:46 PM

Date Filed 08-03-2022Case Number 2022-SU-CV-0308

MM-DD-YYYY

*Lindsey Taylor*Lindsey Taylor, Clerk
Monroe County, Georgia

Plaintiff(s)

Wiggins, Arthur

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney Adams, Christopher

Defendant(s)

CRST Expedited, Inc.

Last First Middle I. Suffix Prefix

CRST Malone, Inc. d/b/a CRST Dedicated Service

Last First Middle I. Suffix Prefix

Calhoun, Albert Wayne

Last First Middle I. Suffix Prefix

Doe, John

Last First Middle I. Suffix Prefix

Bar Number 002709Self-Represented ☐

Check one case type and, if applicable, one sub-type in one box.

General Civil Cases

- ☒ Automobile Tort
- ☐ Civil Appeal
- ☐ Contract
- ☐ Contempt/Modification/Other Post-Judgment
- ☐ Garnishment
- ☐ General Tort
- ☐ Habeas Corpus
- ☐ Injunction/Mandamus/Other Writ
- ☐ Landlord/Tenant
- ☐ Medical Malpractice Tort
- ☐ Product Liability Tort
- ☐ Real Property
- ☐ Restraining Petition
- ☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
- ☐ Contempt
- ☐ Non-payment of child support, medical support, or alimony
- ☐ Dissolution/Divorce/Separate Maintenance/Alimony
- ☐ Family Violence Petition
- ☐ Modification
- ☐ Custody/Parenting Time/Visitation
- ☐ Paternity/Legitimation
- ☐ Support – IV-D
- ☐ Support – Private (non-IV-D)
- ☐ Other Domestic Relations

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

SHERIFF'S ENTRY OF SERVICE

FILED IN OFFICE

CLERK OF SUPERIOR COURT

MONROE COUNTY, GEORGIA

2022-SU-CV-0308

AUG 17, 2022 11:53 AM

Lindsey Taylor, Clerk
Monroe County, Georgia

Civil Action No. 2022-SU-CV-0308

Superior Court ☒State Court ☐Juvenile Court ☐

Date Filed 8/3/2022

Georgia, MONROE

Attorney's Address

Christopher Adams/Kenneth S. Nugent, PC

1355 Peachtree Street, Suite 1000

Atlanta, Georgia 30309

Name and Address of Party to Served

CRST Dedicated Services Inc.

c/o Cogency Global Inc., 2 N. Jackson St.

#605, Montgomery, AL 36104

Arthur Wiggins

Plaintiff

VS.

CRST Expedited Inc, CRST
Malone Inc dba CRST Dedicated
Services Inc., Albert Wayne
Calhoun, and John Doe

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

☐ I have this day served the defendant _____ personally with a copy of the within action and summons.

NOTORIOUS

I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place abode in this County.

☐ Delivered same into hands of _____ described as follows: age, about _____ years; weight _____ pounds; height _____ feet and _____ inches, domiciled at the residence of defendant.

CORPORATION

Served the defendant CRST Dedicated Services Inc a corporation

☐ by leaving a copy of the within action and summons with Haleigh Fergus-Agent In charge of the office and place of doing business of said Corporation in this County. Montg, AL

TACK & MAIL

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an

☐ envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

Diligent search made and defendant _____

☐ not to be found in the jurisdiction of this Court.

This 10 day of Aug, 2022.

DEPUTY

Cpl R Bray

2022SUCV0308



T DEDICATED SERVICES

Def

REC'D 9 AUG 22 4:11:16
MCSO MONTGOMERY, AL

IN THE SUPERIOR COURT OF MONROE COUNTY
STATE OF GEORGIA

AUG 17, 2022 11:53 AM

ARTHUR WIGGINS

Case No.: 2022-SU-CV-0308


 Lindsey Taylor, Clerk
 Monroe County, Georgia

Plaintiff/Petitioner

vs.

CRST EXPEDITED, INC ET AL

Defendant/Respondent

AFFIDAVIT OF SERVICE OF
SUMMONS; PLAINTIFF'S COMPLAINT FOR DAMAGES

Received by Tony Stavely, on the 6th day of August, 2022 at 6:18 PM to be served upon Albert Wayne Calhoun at 1412 South Sycamore Street, Palestine, Anderson County, TX 75801.

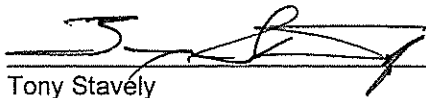
On the 9th day of August, 2022 at 12:42 PM, I, Tony Stavely, SERVED Albert Wayne Calhoun at 1412 South Sycamore Street, Palestine, Anderson County, TX 75801 in the manner indicated below:

SUBSTITUTE SERVICE, by personally leaving 1 copy(ies) of the above-listed documents at his/her usual place of abode with Mrs Albert Calhoun, who is 15 years of age or older, a person residing therein of who confirmed the Defendant resides at the above address and informed that person of the contents thereof.

THE DESCRIPTION OF THE PERSON WITH WHOM THE COPY OF THIS PROCESS WAS LEFT IS AS FOLLOWS:
I delivered the documents to Mrs Albert Calhoun who indicated they were the family member, co-resident with identity confirmed by subject stating their name. The individual accepted service with direct delivery. The individual appeared to be a black-haired black female contact 45-55 years of age and weighing 120-140 lbs.

Per U.S. Code § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

NAME:


 Tony Stavely

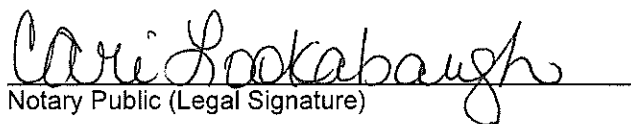
PSC-17636

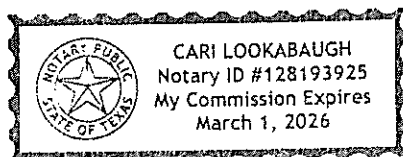
Server ID #

8/11/2022
 Date

Notary Public: Subscribed and sworn before me on this 11 day of August in the year of 2022

Personally known to me or TXDL identified by the following document


 Notary Public (Legal Signature)



REF: 1069729

Page 1 of 1

Tracking #: 0090919315





Tony Stavelly <t.stavelly@civildocs.com>

Application for Renewal of Process Server Certification Approved by Texas Judicial Branch Certification Commission. Online Transaction # 285928

1 message

noreply-external@txcourts.gov <noreply-external@txcourts.gov>

Mon, Jan 10, 2022 at 2:31 PM

To: T.STAVELY@civildocs.com

Cc: alisprocessservers@txcourts.gov

Dear **TONY STAVELY**

Thank you for using our online services.

- Your **Application for Renewal of Process Server Certification** with transaction number **285928** has been approved.
- Below are your certification number and expiration date.

Certification Type	Certification #	Expiration Date
PROCESS SERVER	PSC-17636	12/31/2023

- Your certification card will be mailed to the mailing address in our records.
- This is a system-generated message; please **DO NOT** reply to this email. Replies to this email will not be received by staff. If you have any questions, please email **Process Server Certification Services** at: processservers@txcourts.gov.

Thank you,

Judicial Branch Certification Commission (JBCC)
Office of Court Administration (OCA)

FILED IN OFFICE

CLERK OF SUPERIOR COURT

MONROE COUNTY, GEORGIA

2022-SU-CV-0308

AUG 17, 2022 11:53 AM

SHERIFF'S ENTRY OF SERVICE

Civil Action No. 2022-SU-CV-0308

Date Filed 8/3/2022

Attorney's Address

Christopher Adams/Kenneth S. Nugent, PC

1355 Peachtree Street, Suite 1000

Atlanta, Georgia 30309

Name and Address of Party to Served

CRST Malone Inc. dba CRST Dedicated

Services Inc., c/o Cogency Global Inc., 2 N.

Jackson St., #605, Montgomery, AL 36104

Superior Court ☒State Court ☐Juvenile Court ☐

Georgia, MONROE

Lindsay Taylor
Lindsay Taylor, Clerk
Monroe County, Georgia

Arthur Wiggins

Plaintiff

VS.

CRST Expedited Inc., CRST

Malone Inc. dba CRST Dedicated
Services Inc., Albert Wayne
Calhoun, and John Doe

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

☐ I have this day served the defendant _____ personally with a copy of the within action and summons.

NOTORIOUS

I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place abode in this County.

☐ Delivered same into hands of _____ described as follows: age, about _____ years; weight _____ pounds; height _____ feet and _____ inches, domiciled at the residence of defendant.

CORPORATION

Served the defendant CRST Dedicated Services Inc a corporation☐ by leaving a copy of the within action and summons with Haleigh Fergus - Agent In charge of the office and place of doing business of said Corporation in this County.

TACK & MAIL

☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

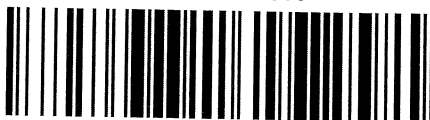
NON EST

☐ Diligent search made and defendant _____ not to be found in the jurisdiction of this Court.This 10 day of Aug, 2022

DEPUTY

cpl R Brody

2022SUCV0308



CRST MALONE INC

Def

RECEIVED
CLERK OF SUPERIOR COURT
MONROE COUNTY, GEORGIA
AUG 22 2022

SHERIFF'S ENTRY OF SERVICE

Civil Action No. 22-CS-221Date Filed 7-25-2022

Attorney's Address

Christopher Adams/Kenneth S. Nugent PC1355 Peachtree Street - Suite 1000Atlanta, GA 30309

Name and Address of Party to Served

Allstate Property & Casualty Insurance Co.c/o CT Corporation System, 289 S.Culver StLawrenceville, GA 30046Superior Court ☐State Court ☒Juvenile Court ☐Georgia, TROUP

22024404
 FILED IN OFFICE
 CLERK OF SUPERIOR COURT
 MONROE COUNTY, GEORGIA
 2022-SU-CV-0308

AUG 18, 2022 04:12 PM

COUNTY
 Lindsey Taylor
 Lindsey Taylor, Clerk
 Monroe County, Georgia

TAMEKA MCPHERSON

Plaintiff

VS.

JACKIE MORMAN, JR.

Defendant

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

☐ I have this day served the defendant _____ personally with a copy of the within action and summons.

NOTORIOUS

I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place abode in this County.

☐ Delivered same into hands of _____ described as follows: age, about _____ years; weight _____ pounds; height _____ feet and _____ inches, domiciled at the residence of defendant.

CORPORATION

Served the defendant Allstate Property & Casualty Insurance Co a corporation

☒ by leaving a copy of the within action and summons with Jane Richardson
 In charge of the office and place of doing business of said Corporation in this County.

TACK & MAIL

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

Diligent search made and defendant _____
☐ not to be found in the jurisdiction of this Court.

This 9 day of Aug, 2022

DEPUTY

W. Coberly 501332

RECEIVED
 22 AUG - 8 PM 3:09
 CIVIL DIV.
 G.C. O.
 Garnishee

SHERIFF'S ENTRY OF SERVICE

Civil Action No. 2022-SU-CV-0308Date Filed 8/3/2022

Attorney's Address

Christopher Adams/Kenneth S. Nugent, PC1355 Peachtree Street, Suite 1000Atlanta, Georgia 30309

Name and Address of Party to Served

Geico General Insurance Companyc/o CT Corporation, 289 S. Culver St.Lawrenceville, GA 30046Superior Court ☒State Court ☐Juvenile Court ☐Georgia, MONROE

COUNTY

Jindsey TaylorJindsey Taylor, Clerk
Monroe County, GeorgiaArthur Wiggins

Plaintiff

VS.

CRST Expedited, Inc., CRST
Malone dba CRST Dedicated
Services, Inc., Albert Wayne
Calhoun, and John Doe

SHERIFF'S ENTRY OF SERVICE

PERSONAL

I have this day served the defendant

☐ of the within action and summons.

NOTORIOUS

I have this day served the defendant
copy of the action and summons at his most notorious place abode in this County.☐ Delivered same into hands of _____ described as follows:
age, about _____ years; weight _____ pounds; height _____ feet and _____ inches, domiciled at the residence of
defendant.

CORPORATION

Served the defendant Geico General Ins. Comp. a corporation☒ by leaving a copy of the within action and summons with Jake Richardson
In charge of the office and place of doing business of said Corporation in this County.

TACK & MAIL

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises
designated in said affidavit and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an☐ envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice
to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

Diligent search made and defendant

☐ not to be found in the jurisdiction of this Court.This 10 day of Aug, 2022

DEPUTY

Lt. Higgins, SO 541FILED IN OFFICE
CLERK OF SUPERIOR COURT
MONROE COUNTY, GEORGIA
2022-SU-CV-0308

AUG 24, 2022 10:32 AM

RECEIVED
2022 AUG -9 AM 8:44
G.C.S.C.
CIVIL DIV.

#22MR00806

SECOND ORIGINAL

SHERIFF'S ENTRY OF SERVICE

FILED IN OFFICE
CLERK OF SUPERIOR COURT
MONROE COUNTY, GEORGIA

2022-SU-CV-0308

AUG 24, 2022 11:40 AM

Civil Action No. 2022-SU-CV-0308

Superior Court ☒State Court ☐Juvenile Court ☐

Date Filed 8/3/2022

Georgia, MONROE

COUNTY
Lindsey Taylor
Lindsey Taylor, Clerk
Monroe County, Georgia

Attorney's Address

Christopher Adams/Kenneth S. Nugent, PC

1355 Peachtree Street, Suite 1000

Atlanta, Georgia 30309

Name and Address of Party to Served

CRST Expedited Inc. c/o Cogency Global Inc

900 Old Roswell Lakes Pkwy - Suite 310

Roswell, GA 30076

COST PAID

AUG 03 2022

Fulton County Marshal's Dept.
Receipt # FMD-0894
\$ 50.00 By: C.N.

Arthur Wiggins

Plaintiff

VS.

CRST Expedited, Inc., CRST
Malone Inc dba CRST Dedicated
Services Inc., Albert Wayne
Calhoun, and John Doe

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

I have this day served the defendant _____ personally with a copy
of the within action and summons.

NOTORIOUS

I have this day served the defendant _____ by leaving a
copy of the action and summons at his most notorious place abode in this County.☐ Delivered same into hands of _____ described as follows:
age, about _____ years; weight _____ pounds; height _____ feet and _____ inches, domiciled at the residence of
defendant.

CORPORATION

Served the defendant CRST Expedited a corporation☒ by leaving a copy of the within action and summons with PAT STANLEY
In charge of the office and place of doing business of said Corporation in this County.

TACK & MAIL

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises
designated in said affidavit and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an
☐ envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice
to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

Diligent search made and defendant _____
☐ not to be found in the jurisdiction of this Court.This 16 day of AUG, 2022

DEPUTY

P B 414